

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 7
	)	
ALLHERE EDUCATION, INC.,	)	Case No. 24-11841 (LSS)
	)	
Debtor.	)	Hearing Date: February 20, 2025 at 10:15 a.m. (ET)
	)	Obj. Deadline: February 13, 2025 at 4:00 p.m. (ET)

**NOTICE OF MOTION OF GEORGE L. MILLER, CHAPTER 7 TRUSTEE, FOR AN  
ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL RULE 2004-1  
COMPELLING THE PRODUCTION OF RECORDS FROM GUSTO, INC.**

**PLEASE TAKE NOTICE** that, on February 4, 2025, George L. Miller (the “Trustee”), solely as Chapter 7 Trustee of AllHere Education, Inc. (the “Debtor”) filed the *Motion of George L. Miller, Chapter 7 Trustee, for an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Compelling the Production of Records from Gusto, Inc.* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Court’s approval of the Motion must be (a) in writing and served on or before **February 13, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”); (b) filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801; and (c) served as to be received on or before the Objection Deadline by the undersigned attorneys.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON FEBRUARY 20, 2025 AT 10:15 A.M. BEFORE THE HONORABLE LAURIE SELBER SILVERTEIN, UNITED STATES BANKRUPTCY JUDGE FOR THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6<sup>TH</sup> FLOOR, COURTROOM #2, WILMINGTON, DE 19801.**

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: February 4, 2025  
Wilmington, Delaware

**ASHBY & GEDDES, P.A.**

/s/ Ricardo Palacio

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